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STIPULATION AND ~~PROPOSED~~ ORDER FOR EXTENSION OF TIME TO SUBMIT PROPOSED TRIAL SCHEDULE  
Case No.: CV 10-05615 JSW

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure and Rule 6-1(b) of the Civil Local Rules of the United States District Court, Northern District of California, Plaintiff U2 HOME ENTERTAINMENT, INC., a California corporation, doing business as CENTURY HOME ENTERTAINMENT and TAI SENG ENTERTAINMENT (“U2” or “Plaintiff”), on the one hand, and Defendant iTALK GLOBAL COMMUNICATIONS, INC., doing business as iTALKBB (“Defendant” or “iTalk”), on the other hand, hereby agree and stipulate as follows:

WHEREAS, a Case Management Conference was held in this matter on July 22, 2011, at 1:30 p.m. in Courtroom 11; and

WHEREAS, at the Case Management Conference the Honorable Judge Jeffrey S. White ordered counsel for U2 and Defendant iTalk to submit a supplemental CMC Statement (“Supplemental CMC Statement”) setting forth a schedule for the pre-trial proceedings (to cover up to the hearing date for dispositive motions) by no later than July 29, 2011; and

WHEREAS, all of the parties to this case, including Defendant HANYA STAR CULTURE & TECHNOLOGY CO., LTD., a foreign corporation doing business in California, and doing business as HANYA STAR COMPANY, INC., who has not yet been served, have been engaging in settlement discussions and are very close to reaching a settlement of this matter;

WHEREAS, one or more parties have asked their counsel not to engage in additional work pending the outcome of such settlement discussions; and

WHEREAS, in light of these events the parties believe it would serve judicial economy and conserve resources if the time to submit the Supplemental CMC Statement be extended by thirty (30) so that the parties can hopefully complete a settlement of this matter without incurring additional attorneys’ fees; and

WHEREAS, Rule 6-1(b) of the Civil Local Rules of the United States District Court, Northern District of California, permits the parties to request an enlargement of time by stipulation in writing; and

WHEREAS, Plaintiff and Defendant iTalk agree that the requested enlargement of time will allow the parties adequate time to further discuss settlement and potentially reach a settlement of this matter; and

WHEREAS, Plaintiff and Defendant iTalk agree that the date by which Plaintiff and iTalk shall submit the Supplemental CMC Statement shall be no later than August 29, 2011, and;

NOW THEREFORE, Plaintiff and Defendant iTalk, by and through their respective undersigned counsel, hereby stipulate that the time for the Plaintiff and Defendant iTalk to submit the Supplemental CMC Statement that was ordered by the Court at the July 22, 2011 Case Management Conference be extended up to and including August 29, 2011; and

SO STIPULATED.

IDELL & SEITEL LLP

Dated: July 29, 2011

By: /Richard J. Idell/

Richard J. Idell

*Attorneys for Plaintiff U2 HOME ENTERTAINMENT, INC.*

Dated: July 29, 2011

BAKER & MCKENZIE LLP

By: /Tod L. Gamlen/

Tod L. Gamlen

*Attorneys for Defendant*

*iTALK GLOBAL COMMUNICATIONS, INC. dba iTALK BB*

**ATTESTATION OF CONCURRENCE**

I, Richard J. Idell, attest that I am one of the attorneys for Plaintiff U2 Home Entertainment, Inc., and as the ECF user and filer of this document, I attest that, pursuant to General Order No. 45(X)(B), concurrence in the filing of this document has been obtained from Tod L. Gamlen, the above signatory.

Dated: July 29, 2011

By: /Richard J. Idell/

Richard J. Idell

**~~PROPOSED~~ ORDER**

**IT IS SO ORDERED.**

1 Dated: August 1, 2011

  
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Hon. Jeffrey S. White  
Judge of the United States District Court  
Northern District of California